

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

In re: NEXIUM (ESOMEPRAZOLE)  
ANTITRUST LITIGATION

MDL No. 2409

Civil Action No. 1:12-md-02409-WGY

This Document Relates To:

All Direct Purchaser Class Actions

**DIRECT PURCHASER CLASS PLAINTIFFS' MOTION FOR PRELIMINARY  
APPROVAL OF CLASS ACTION SETTLEMENT WITH DR. REDDY'S  
LABORATORIES, LTD. AND DR. REDDY'S LABORATORIES, INC. ("DRL")**

Pursuant to Federal Rule of Civil Procedure 23, Direct Purchaser Class Plaintiffs ("Plaintiffs") respectfully move for entry of the Preliminary Approval Order proposed herewith (attached as Exhibit B): (1) granting preliminary approval of the proposed Direct Purchaser Class Action settlement with DRL; and (2) directing Plaintiffs to file a motion to approve notice to the Class, appoint a Claims Administrator, and set a schedule for implementation thereof by October 27, 2014.

The grounds for this motion are set forth in the accompanying Memorandum of Law, Declaration of Bruce E. Gerstein, and exhibits thereto.

Dated: October 19, 2014

/s/ Joseph Oppen

Bruce E. Gerstein

Joseph Oppen

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**CERTIFICATE OF SERVICE**

I, Joseph Oppen, hereby certify that I caused a copy of the foregoing to be filed electronically via the Court's electronic filing system. Those attorneys who are registered with the Court's electronic filing system may access these filings through the Court's system, and notice of these filings will be sent to these parties by operation of the Court's electronic filing system.

Dated: October 19, 2014

**/s/ Joseph Oppen**  
Joseph Oppen